

**REMARKS**

Applicant hereby submits the amendments listed above. In particular, the amendment to pg. 16 of the application brings the specification in conformity with Fig. 3. As can be seen from Fig. 3, the paragraph in question describes the action that occurs in step 309.

Applicant also points out that claims 10 and 20 were canceled in the response to the last office action and are no longer pending.

**35 U.S.C. 103(a)**

The Examiner has rejected claims 1-5, 11 under 35 U.S.C. 103(a) as being unpatentable over Schneck et al., (6,260,039) in view of Perkowski (5,918,214) and claims 6-10, 12-20 under 35 U.S.C. 103(a) as being unpatentable over Schneck et al., in view of Call (6,154,738). In reply, Applicant emphasizes that a claim is anticipated if, and only if, each and every element in the claim is found, either expressly or inherently, in the prior art reference(s); and will show that no anticipation exists here for the following reasons.

**Claims 1, 3-5, 11**

Regarding these claims, claim 2 has been cancelled. As for the other claims, the examiner proposed that it would have been obvious to one ordinary skilled in the art at the time the invention was made to implement the claimed invention because Schneck teaches the substantial features of the claimed invention. Applicant respectfully disagrees. With respect to the amended claim 1, Schneck fails to teach, describe, or suggest the following limitations:

(a) “a directory of identifiers and metadata to a plurality of network services;”

(b) “an engine for receiving requests, using said identifiers in said directory to direct said requests to access said network services when requested, and constructing a state storing session for interfacing with said network services, wherein said session uses a driver to interface with each of said network services and said session is configured from said metadata from said directory;”

In regard to limitation (a), Schneck does not teach a method/system comprising storing identifiers and metadata of a plurality of services in a directory. Specifically, with regard to “identifiers in a directory”, the Examiner cited that Schneck teaches “storing identifiers of a plurality of network services (col. 4/lines 23-33, 43-63, col. 3/lines 37-38) in a (104) directory (col. 3/lines 37-38).” And with regard to “metadata”, the Examiner cited that Schneck teaches “metadata descriptive information, i.e. metadata” in a previous rejection of claim 2, citing col. 3/lines 57-60, which states:

... 202, which responds to the requests; map 212, which correlates the requests to the template files (i.e. request mapping) and correlates abbreviated names to unabbreviated names (i.e. friendly name mapping); and template files 214...

However, Applicant submits that in Schneck’s teaching, map 212 is not the same as directory 104 (Fig. 2). As such, even if the cited reference of map 212 contains metadata, it is not in a directory (104) with identifiers, as cited by the Examiner. They are separate entities and Schneck does not contain any teaching to combine them for single location storage, as is the case with the directory of the present invention. Furthermore, Fig. 3 of Schneck clearly teaches that accesses to directory (104) and map (212) occur in two different steps (302 and 304) (col. 5 lines 1-7). In contrast, the present invention stores identifiers and metadata in a single directory and the access is made in one step.

As stated in limitation (b), the engine uses the metadata for several operations when a request is accepted. In Schneck, there is no mention of session tracking, wherein multiple requests can access a state storing session as in the present invention. Furthermore, each session

is configured by using the metadata stored in the directory. Schneck does not teach any of such use of metadata.

Finally, as the Examiner stated, Schneck “does not explicitly teach using said identifiers to access said network services.” Applicant maintains that an important distinction needs to be made here about the content of the directory. While both the present invention and Schneck’s invention have data in their respective directories, the data stored in Schneck’s directory are contact information and organizational information and do not identify any network service external to the directory. All incoming requests receive responses composed of information from Schneck’s directory. In contrast, the data in the present invention’s directory are identifiers used for accessing network services.

As for the Perkowski reference, the Examiner cited that Perkowski teaches “using a plurality of directories to access services.” Applicant still maintains that the term “service”, as used in Perkowski, refers to physical services (i.e. delivered and performed by humans) (col. 8 line 46 – col. 9 line 13). The cited reference clearly states that the “services” in question have UPC numbers, which are commonly used to identify actual products and services. More over, servicemark and trademark are mentioned in conjunction with the term “service” in Perkowski. As such, other terms within Perkowski, (e.g. directory of services, service information) cannot be interpreted contrary to the meaning taught by the specification.

If the rationale for rejection is to be maintained, the only other possible interpretation is that the computing entities that return product and service information are themselves “services” according to the definition of the present invention, since Perkowski does teach that a request to IPSP will result in information about products and services being returned by a computing entity (col. 3, lines 22-40). On this point, Applicant contends that Perkowski does not teach that the IPSP contains metadata about the computing entity that returns such information. Col 8/line 46 -

Col 9/line 35 are cited by the Examiner as the reference for the IPSP directory returning identifiers and metadata of network services. However, Applicant submits that the information contained in the Perkowski directory are not metadata related to a network service. Certainly none of the information (e.g. numeric or IP/SN Information Field, UPC codes) is used to  
5 configure a state storing session for interaction with network services, as the metadata are utilized in the present invention (limitation (b)). The information in the IPSB are data about products and services offered.

Furthermore, as with Schneck, Perkowski does not teach the elements of “a state storing session for interfacing with said network services” and “session is configured from said metadata  
10 from said directory.”

Applicant thus contends that Perkowski and Schneck, either alone or in combination, do not teach the every element claimed invention. Furthermore there is no suggestion in the references to modify them to make the claimed invention. Applicant asserts that the 103(a) rejection on claim 1 has been overcome.

15 As claims 3-5 depend from claim 1 or another claim that depends on claim 1, these claims are in a condition for allowance as well. Their rejection based upon 35 U.S.C. 103(a) has been overcome.

20 **Claims 6-10, 12-20**

Claim 12 has been cancelled. As for the rest of the claims, the examiner proposed that it would have been obvious to combine Schneck and Call to make the claimed invention. With respect to claim 6-10, Call does not teach the limitations of claim 1 that both Schneck and Perkowski fail to teach. Call does not teach or suggest any of the limitations from claim 1.

Specifically, there is no mention of a directory in Call. Thus, even in combination with Call, the prior art does not teach all the limitations of claim 1. As claims 6-10 all depend on claim 1, Applicant asserts that their rejection based on 103(a) is overcome.

Claim 13-20 overcomes the 103(a) rejection for the same reason as claim 6-10, as claims  
5 13-20 depend on claim 11. Applicant submits that they are in a condition of allowance as well.

### **Phone Interview**

A phone interview was conducted between the Applicant and the Examiner on April 22, 2003. Applicant submitted some of the proposed amendments outlined here in this formal reply  
10 and highlighted several issues regarding the features outlined in claims 1 and 11. The Examiner has requested the issues be restated in a formal response, which the Applicant has done it filing this formal reply to this non-final office action.

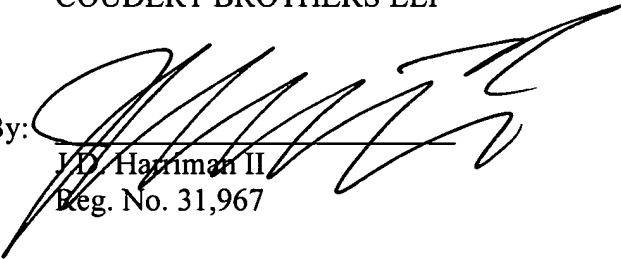
**CONCLUSION**

The Examiner has rejected claims 1-9 and 11-19 under 35 U.S.C. 103(a). In response,  
5 Applicant has cancelled claims 2 and 12, amended claims 1, 3, 11 and 13, and responded to the  
35 U.S.C. 103(a) rejection on the pending claims 1, 3-9, 11, and 13-19. Applicant has also added  
claims 21 - 105. Applicant asserts that the present application is in a condition for allowance.

Respectfully submitted,

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